



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

May 28, 2020

MEMORANDUM

SUBJECT: Addendum No. 1 Quality Assurance Project Plan TCE Clinton Engines, Maquoketa, Iowa – Approved with Conditions

FROM: Diane Harris, Regional Quality Assurance Manager
Laboratory Services and Applied Science Division

**DIANE
HARRIS**

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Date: 2020.05.27
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TO: Yvonne Smith, EPA Project Officer
Response and Removal Oil Planning Section
Assessment Emergency Response and Removal Branch
Superfund and Emergency Management Division

The request to review the subject document prepared by Tetra Tech, Inc., dated April 24, 2020, has been completed according to “EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,” EPA QA/R-5 March 2001. This document is an addendum, which focuses on collection of soil, soil gas, and groundwater samples, to the previously approved with conditions original QAPP dated March 13, 2020 (R7QAO Document No. 2020080).

Based on the comments below, the document is approved with conditions. The document was found to be incomplete in addressing key areas to the extent of potentially jeopardizing the quality of the data. The areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments were identified as an opportunity for strengthening the document, but do not affect approval.

CRITICAL COMMENTS

1. Sections Soil Sampling, Soil-gas Sampling, Private/Municipal well sampling, and Quality Control Samples: These sections need to address the action levels, standards, and/or evaluation criteria to be utilized for all matrices including what is considered elevated concentrations of volatile organic compounds utilizing the photoionization detector (PID) and the procedures/method to be utilized for the PID.
2. Section Soil-gas Sampling: This section states “A subcontracted mobile laboratory will analyze soil gas samples on site for VOCs, however, Table 1 references utilizing analytical method EPA SOP 2318.10 which is an EPA Region 7 SOP. Therefore, the appropriate analytical method to be utilized by the subcontracted mobile laboratory needs to be verified and referenced.
3. Section Quality Control Samples: This section and Table 1 need to address equipment rinsate samples if to be collected for soil and groundwater sampling to evaluate the effectiveness of



decontamination procedures and if any quality control samples are to be collected for soil-gas sampling as addressed in the EPA SOP 4231.2042.

GENERAL COMMENTS

4. Section Soil Sampling and Private/Municipal well sampling: These sections reference utilizing a PID and recording water quality parameters, therefore, it assumed that the testing, inspection, maintenance, and calibration of these instruments will occur as specified in the original QAPP Sections 2.6 and 2.7 per the manufacturers' recommendations.
5. Sections Quality Control Samples and Analytical Methods: These sections respectively state "QC samples will be analyzed...according to EPA Standard Operating Procedure (SOP) 3230.13" and "Water samples will be submitted to the EPA Region 7 laboratory." Since soil samples are also to be analyzed, it would be helpful to address that water samples will be analyzed by SOP 3230.13 and soil samples will be analyzed by SOP 3230.16 and that the soil samples will also be submitted to the EPA Region 7 laboratory as stated in Sections Soil Sampling and Private/Municipal well sampling and Table 1 for consistency.

If you have any questions, please contact Rebecca Estep, Lead Reviewer, at x7598 or me at x7258.

R7QAO Document Number: 2020109